

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Plaintiffs,

v.

National Football League and
NFL Properties LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**No. 2:18-md-02323-AB
MDL No. 2323**

No. 2:12-md-02323-AB
MDL No. 2323

Hon. Anita B. Brody

Civ. Action No. 14-00029-AB

**SWORN DECLARATION OF AMELIA STEELHEAD IN RESPONSE TO JUDGE
BRODY'S ORDER OF MARCH 28, 2018**

AMELIA STEELHEAD declares as follows pursuant to 28 U.S.C. § 1746:

1. I am an associate with the law firm of Rose Klein & Marias LLP. I submit this sworn declaration in response to Judge Brody's Order of March 28, 2018. I have personal knowledge of the matters set forth in this declaration and, if called upon, I could and would testify competently thereto.

2. I hereby answer the questions put forth by the Court in its Order dated March 28, 2018, as follows:

1A. Rose, Klein & Marias LLP previously represented Fourteen (14) Settlement Class Members whom we no longer represent.

1B. Rose, Klein & Marias LLP currently represents Nineteen (19) Settlement Class Members.

2A. Three (3) Settlement Class Members currently represented by Rose, Klein & Marias, LLP have received a Monetary Award.

2B. Two (2) Settlement Class Members currently represented by Rose, Klein & Marias, LLP have received Monetary Award Offers, but have chosen to have their claims reevaluated by the AAP Committee.

2C. Ten (10) Settlement Class Members currently represented by Rose, Klein & Marias, LLP have applied for a Monetary Award. This number includes the class members in 2A and 2B above.

2D. I expect an additional eight (8) Settlement Class Members currently represented by Rose, Klein & Marias, LLP who have not yet applied for a Monetary Award, to be eligible to receive a Monetary Award.

3. One (1) Settlement Class Member (Settlement Class Member "A") currently represented by Rose, Klein & Marias, LLP has entered into an agreement to assign their rights to a Monetary Award. To the extent any Settlement Class Member formerly represented by Rose, Klein & Marias LLP have entered into an agreement to assign their rights to a Monetary Award it was done without my knowledge or the knowledge of any other attorney associated with Rose, Klein & Marias, LLP. (See attached Exhibits "1" and "2".)

4. One (1) Settlement Class Member currently represented by Rose, Klein & Marias LLP has entered into an assignment of their rights to a Monetary Award. (See attached Exhibits "1" and "2".)

5. One (1) Settlement Class Member currently represented by Rose, Klein & Marias LLP has directed Rose, Klein & Marias LLP to forward a portion of Settlement Class Member "A's" Monetary Award to a third party litigation funder. (See attached Exhibits "1" and "2".) Said Settlement Class Member originally entered into an assignment of their rights to a Monetary Award with Prospect Funding Holdings LLC (Prospect), a true and correct copy of which agreement is attached hereto as Exhibit "1." I am informed and believe that Atlas Legal Funding II, L.P. subsequently purchased Prospect Funding Holdings LLC's assignment, and now Atlas Legal Funding II, L.P. is the only third party litigation funder of which I am aware that has an assignment of rights to a Monetary Award with respect to Settlement Class Member "A." A true and correct copy of Atlas Legal Funding II, L.P.'s Funding Agreement with Settlement Class Member "A" is attached hereto as Exhibit "2."

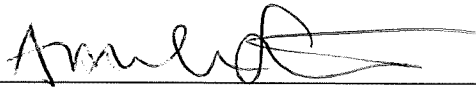
6. Neither I, nor any other attorney associated with my firm played any role in creating, promoting, or facilitating any Assignments by any Settlement Class Member.

7. Neither I, nor any other attorney associated with Rose, Klein & Marias LLP or any individual or entity related to Rose, Klein & Marias LLP, have any direct or indirect (personal or professional) association with any of the third party litigation funders used by Settlement Class Members previously or currently represented by me, Rose, Klein & Marias LLP or any other attorney associated with Rose, Klein & Marias LLP.

8. No Assignments to a Settlement Class Member's Monetary Award have been resolved in accordance with the rescission process provided for in ECF No. 9517.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 7, 2018, at Los Angeles, California.



Amelia Steelhead


CERTIFICATE OF SERVICE

I hereby certify that on May 7, 2018, I caused the foregoing document to be filed with the United States District Court for the Eastern District of Pennsylvania via the Court's CM/ECF system, which will provide electronic notice to all counsel and parties.

DATED: May 7, 2018

ROSE, KLEIN & MARIAS LLP

By:



Amelia A. Steelhead